

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**UNITED STATES OF AMERICA,  
*ex rel.* CHRISTINE BOUQUIN,**

**Case No.: 17-CV-2496-RJS**

**Plaintiff,**

**V.**

**GARDAWORLD,  
GARDA USA, INC.,  
GARDAWORLD CASH SERVICES,  
GARDA CL SOUTHEAST, INC.,  
GARDA CL WEST, INC.,  
GARDA CL EAST, INC.,  
GARDA CL NORTHWEST, INC.,  
GARDA CL CENTRAL, INC.,  
GARDA CL ATLANTIC, INC.,  
GARDA WORLD GOVERNMENT SERVICES, INC.,  
and  
JOHN DOES 1-10,**

**Defendants.**

**Filed Under Seal  
31 U.S.C. § 3730(b)(2)**

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**RELATOR’S NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE  
PURSUANT TO FRCP 41**

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Relator, Christine Bouquin, hereby gives Notice that this action is dismissed without prejudice pursuant to FRCP 41(a)(1). The Complaint has not been served and no Answer or motion for summary judgment has been filed.

This action was brought pursuant to the False Claims Act. Following the United States of America’s declination of the matter, this Court Ordered, on January 9, 2018, that the Complaint be unsealed thirty days after entry of the Order. In the Court’s Order unsealing the Complaint, the Court Ordered that “[s]hould the relator or the defendants propose that the Complaint or any of its

allegations be dismissed, settled, or otherwise discontinued, or that defendants be dismissed from the case, the moving party (or parties) must solicit the written consent of the government before applying for Court approval.”

The United States consents with this Notice of Dismissal so long as the action is dismissed without prejudice as to the United States.

Respectfully submitted,

/s/ David P. Weber

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MAHANY LAW

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**CERTIFICATE OF SERVICE**

I, Brian H. Mahany, an attorney, certify that on May 25, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Brian H. Mahany  
Brian H. Mahany